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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No.: 2:22-cr-00161-JAM
Plaintiff,	)	
vs.	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>CONTINUE STATUS CONFERENCE</b>
	)	Date: April 25, 2023
	)	Time: 9:00 a.m.
JAMES MECHAM, et al.	)	Judge: Hon. Judge John A. Mendez
Defendants	)	

**STIPULATION**

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney HEIKO COPPOLA, and defendant JAMES MECHAM, both individually and by and through his counsel of record, Thomas A. Johnson, defendant KURT STOCKS, both individually and by and through his counsel of record, Malcolm S. Segal, and defendant HEIDI EDWARDS, both individually and by and through her counsel of record, Christina Sinha, hereby stipulate as follows:

1. By previous order, this matter was set for Status Conference on April 25, 2023.
2. By this stipulation, defendant now moves to continue the Status Conference to **July 25, 2023, at 9:00 a.m.**, before the Honorable Judge John A. Mendez.
3. The parties agree and stipulate, and request the Court find the following:
  - a. A continuance is requested because counsel for all defendants need additional time to review the discovery, conduct investigation, evaluate the case, and discuss a potential resolution.

- 1 b. Counsel for all defendants believe the failure to grant a continuance in this case  
2 would deny defense counsel reasonable time necessary for effective  
3 preparation, taking into account the exercise of due diligence.  
4 c. The Government does not object to the continuance.  
5 d. Based on the above-stated findings, the ends of justice served by granting the  
6 requested continuance outweigh the best interests of the public and the  
7 defendants in a speedy trial within the original date prescribed by the Speedy  
8 Trial Act.  
9 e. For the purpose of computing time under the Speedy Trial Act, 18 United  
10 States Code Section 3161(h)(7)(A) within which trial must commence, the  
11 time period of April 25, 2023, to July 25, 2023, inclusive, is deemed  
12 excludable pursuant to 18 United States Code Section 3161(h)(7)(A) and  
13 (B)(iv), corresponding to Local Code T-4 because it results from a continuance  
14 granted by the Court at defendant's request on the basis of the Court's finding  
15 that the ends of justice served by taking such action outweigh the best interest  
16 of the public and the defendant in a speedy trial.  
17 4. Nothing in this stipulation and order shall preclude a finding that other provisions  
18 of the Speedy Trial Act dictate that additional time periods are excludable from  
19 the period within which a trial must commence.  
20

21 **IT IS SO STIPULATED.**

22 DATE: April 20, 2023

23 /s/ Thomas A. Johnson  
24 THOMAS A. JOHNSON  
25 Attorney for James Mecham  
26  
27  
28

1 DATED: April 20, 2023

PHILIP A. TALBERT  
Acting United States Attorney

2  
3 /s/ Heiko Coppola  
HEIKO COPPOLA  
4 Assistant U.S. Attorney

5 DATE: April 20, 2023

6 /s/ Malcolm S. Segal  
MALCOLM S. SEGAL  
7 Attorney for Kurt Stocks

8  
9 DATE: April 20, 2023

10 /s/ Christina Sinha  
CHRISTINA SINHA  
11 Attorney for Heidi Edwards

12  
13  
14 **ORDER**

15  
16 **IT IS SO ORDERED.**

17 Dated: April 20, 2023

18 /s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
19 SENIOR UNITED STATES DISTRICT JUDGE